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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CRAIG ZUCHELKOWSKI,

Plaintiff,

vs.

GEICO GENERAL INSURANCE  
COMPANY, a Foreign Corporation; LEIGH  
AUBUCHON, an individual; DOES I  
through XX, inclusive; and ROE BUSINESS  
ENTITIES I through XX, inclusive,

Defendants.

Case No. 2:20-cv-2182-GMN-EJY

**STIPULATION TO PERMIT  
PLAINTIFF ADDITIONAL TIME TO  
FILE AN AMENDED COMPLAINT**

**[FIRST REQUEST]**

Pursuant to Federal Rule of Civil Procedure 6(b) and the Court's Local Rule of Civil Practice 7-1, the parties respectfully request that the Court extend the current deadline by 30-days, or until April 5, 2023, for Plaintiff to file an amended complaint in compliance with the Court's February 13, 2023 Order. *See* ECF No. 39. Presently, Plaintiff's amended complaint is due today, March 6, 2023. This is the parties first request for an extension of time for the purpose set forth herein.

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Good cause supports the approval of this Stipulation. As explained to counsel for Defendants, Plaintiff's primary counsel, Srilata Shah, Esq. is currently out of the country tending to a family matter and is not expected to return to the office until the end of this month. Paul Padda, who is less familiar with this case, has been required, in Ms. Shah's absence, to review the Court's Order and commence work on an amended complaint. However, because undersigned counsel for Plaintiff has not had the level of involvement in this case that Ms. Shah had, additional time will be needed to properly understand the case and prepare an amended complaint that contains the additional factual detail required by the Court's February 13, 2023 Order. The parties have communicated regarding this matter and agree that a short extension of 30-days is warranted and appropriate under the circumstances.

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1 In light of the foregoing, the parties respectfully request that the Court approve this  
2 Stipulation and permit Plaintiff to file an amended complaint on or before April 5, 2023.

3 Respectfully submitted,

4  
5 /s/ Jonathan W. Carlson

/s/ Paul S. Padda

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Jonathan W. Carlson, Esq.  
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Las Vegas, Nevada 89103

10 *Attorney for Defendants*

*Attorneys for Plaintiff*

11 Dated: March 6, 2023

Dated: March 6, 2023

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14 **IT IS SO ORDERED**

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UNITED STATES DISTRICT JUDGE

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20 Dated: March 6, 2023

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